



March 17, 2020

**VIA ECF, ELECTRONIC MAIL, & U.S.P.S. Mail**

Hon. Vernon S. Broderick, U.S.D.J.  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 518  
New York, NY 10007

**APPLICATION GRANTED  
SO ORDERED**

**VERNON S. BRODERICK  
U.S.D.J. 3/20/2020**

**Re: *In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig.*, MDL No. 2542; Request to File Under Seal**

Dear Judge Broderick:

We write on behalf of Plaintiff JBR, Inc. d/b/a Rogers Family Company (“JBR”) to request that the Court seal JBR’s Motion and Objection to Magistrate Judge Ruling ECF No. 831 and exhibit 1 pursuant to Rules 1.A. and 5.B. of Your Honor’s Individual Rules & Practices in Civil Cases. Because the proposed memorandum and exhibit involve potentially confidential material, JBR proposes to file unredacted copies of the materials with the Court, and to publicly file redacted copies.

JBR makes this sealing request to protect the potential confidentiality interests of Keurig. The proposed sealing concerns descriptions of, quotations from, and excerpts from unredacted deposition testimony of Keurig witnesses and Keurig documents designated by Keurig as confidential or highly confidential under the terms of the Protective Order (ECF No. 496) in this matter, as well as a portions of JBR’s previous filed letter motion ECF No. 762 and exhibits and Keurig’s previously filed declaration. The previously filed JBR letter motion and exhibits and previously filed Keurig declaration have already been sealed by the Court as a result of prior motions to seal. JBR takes no position as to the confidentiality of the materials designated by Keurig, and reserves the right to challenge the confidentiality designations at a later date.

JBR’s proposed filing is narrowly tailored to protect the potential confidentiality of the subject matter at issue, and it requests that the Court permit the filing of these unredacted documents under seal.

Respectfully submitted,

/s/ Daniel Johnson Jr.  
Daniel Johnson Jr.

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cc: Counsel for All Parties via ECF (Sealed documents sent via email)

